

September 19, 2003

ESDR-269-03  
05-A-01-C

**VIA CERTIFIED MAIL – 7002 3150 0003 9827 1381**

Mr. Steve Hill  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109

**Subject: Additional Corrections Regarding the ConocoPhillips Company  
San Francisco Refinery (Facility #A0016) Draft Title V Permit (7/25/03 version)**

Dear Mr. Hill:

This letter and the corresponding attachments provide ConocoPhillips Company's ("ConocoPhillips") comments to the Draft Title V Permit ("Draft Permit") issued on July 25, 2003. Attachment 1 is a table summarizing the corrections to the Draft Permit. Attachment 2A is a discussion of sulfur plant operation and proposed changes. Attachment 2B is Confidential Business Information containing sulfur production data. Attachment 3 is a table showing the source-specific applicable requirements for S-376, S-377, and S-378. We have also provided immediately below certain general and source-specific comments regarding the Draft Permit.

**General Comments**

We request that a five-month future effective date be granted for any new monitoring imposed as a result of the Title V permit process and not listed in the current Facility Permit to Operate (PTO). The five-month future effective date will provide us three months to install a monitoring system and two months to test and implement the system.

In comparing the PTO to the Draft Permit, we found several instances where the PTO has conditions that have been removed or are different than in the Draft Permit. For example, Permit Condition 1694 for S-10 shows an hourly-firing limit of 184 mm BTU/hr in the PTO, while the Draft Permit shows a firing limit of 223 mm BTU/hr. The hourly-firing limit of 223 mm BTU/hr in the Draft Permit limit is the correct limit and we previously provided documentation to Mr. Julian Elliot that supports this limit.

We request that the PTO be updated to show the same permit conditions as shown in the Final Title V permit. We also request that the Facility PTO be eliminated for those facilities that have Title V permits (maintaining two permits is both burdensome and confusing for BAAQMD and the regulated community).

Source Specific Comments

We found one instance where a new permit condition (18680) has been added to the PTO but is missing from the Draft Permit. As written, this permit condition does not reference the source number to which it applies. We believe the District intended it to apply to S-294, Non-retail Gasoline Dispensing Facility, and therefore, request that the PTO be modified accordingly.

The main refinery flare (CP-1), S-296, is not subject to 40 CFR 60 subpart J. All permit conditions that reference Subpart J for this flare should be deleted.

We request that Permit Condition 18255 for flares be modified as follows:

- 1) Assume compliance with visible emission standard if flow does not exceed 330 SCFM for 15 consecutive minutes.*
- 2) If flow does exceed 330 SCFM for 15 consecutive minutes, and the operator can determine there are no visible emissions using video monitoring, no further monitoring is required.*
- 3) If further monitoring is required, conduct visible inspection. Visible inspections shall be repeated every 30 minutes unless a) the flaring event continues in a steady and stable state where it can be reasonably assured that smoking would not occur if it had not been previously observed or b) video monitor rules out visible emissions.*
- 4) If visible inspection detects visible emissions in excess of 5 continuous minutes, visible emissions shall be reported as a Title V instance of non-compliance.*
- 5) Visible inspections shall be documented on log made available to BAAQMD.*

Several tanks that are exempt under BAAQMD 2-1-123 and have applicable requirements listed in Section IV of the Draft Permit were missing from Table IIC Sources Exempt from Permit Requirements. Details are found in Attachment 1.

The sulfur plant (S-301, S-302, S-303, S-1001, S-1002, and S-1003) is one complex containing three trains and should be considered as a single process. It should be grandfathered entirely as it has not gone through the new source review process. In addition, we request an overall throughput limit for the sulfur plant. The Draft Permit also lists incorrect units for the sulfur plant. We have provided a detailed explanation of the requested permit corrections relating to the Sulfur Plant in Attachment 2A and corresponding data (confidential business information) in Attachment 2B.

ConocoPhillips has attempted to capture all of our comments in this and previous submittals to BAAQMD. Notwithstanding this effort, however, ConocoPhillips reserves its right to provide additional comments as appropriate throughout the Title V permitting process.

We have certainly appreciated Julian Elliot's efforts to incorporate our comments regarding the previous version of the Draft Title V permit into the version issued on July 25, 2003. We look forward to our continued collaboration with Mr. Elliot and the District to address the comments identified above. If you have any questions or need further clarifications, please contact Ms. Valerie Uyeda at (510) 245-5249.

Sincerely,

Phillip C. Stern  
Environmental Superintendent

PCS/vju  
Attachments

cc: Mr. Julian Elliot, Permit Engineer  
BAAQMD  
939 Ellis Street  
San Francisco, CA 94109

Mr. Gerardo Rios, Chief Permits Division  
US EPA  
75 Hawthorne Street  
San Francisco, CA 94105

bcc (w/ attachments):

- J. Greene, Legal
- V. Uyeda, Environmental
- C. Peoples, e2M (Attachment 1 and 3 only)
- 05-A-01-C: Title V Permit Corrections

bcc (w/o attachments)

- P. Stern
- D. Erfert